

FORM TO BE USED BY PRISONERS IN FILING A COMPLAINT UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. §1983

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

COMPLAINT

Thomas 108168
(Last Name) (Identification Number)

Landon Earl
(First Name) (Middle Name)

Pike County Jail
(Institution)

2109 Jesse Hall Rd, Magnolia, Ms 39652
(Address)

(Enter above the full name of the plaintiff, prisoner and address of plaintiff in this action)

V.

CIVIL ACTION NUMBER:

5:24-CV-05-DCB-FKB
(to be completed by the Court)

Pike County, Mississippi

Sheriff James Brumfield

Captain Richard Bynum

Herbert Young, Valerie Wells

(Enter the full name of the defendant(s) in this action)

Briana Perryman, Kimberly Wallace

GENERAL INFORMATION

- A. At the time of the incident complained of in this complaint, were you incarcerated?
Yes (☒) No (☐)
- B. Are you presently incarcerated?
Yes (☒) No (☐)
- C. At the time of the incident complained of in this complaint, were you incarcerated because you had been convicted of a crime?
Yes (☐) No (☒)
- D. Are you presently incarcerated for a parole or probation violation?
Yes (☒) No (☐)
- E. At the time of the incident complained of in this complaint, were you an inmate of the Mississippi Department of Corrections (MDOC)?
Yes (☐) No (☒)
- F. Are you currently an inmate of the Mississippi Department of Corrections (MDOC)?
Yes (☒) No (☐)

PARTIES

(In item I below, place your name and prisoner number in the first blank and place your present address in the second blank.)

I. Name of plaintiff: Landon Thomas Prisoner Number: 108168
 Address: 2109 Jesse Hall Rd, Magnolia, Ms 39652

(In item II below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use the space below item II for the names, positions and places of employment of any additional defendants.)

II. Defendant: ~~Captain~~ Richard Bynam is employed as Captain
 at Pike County Jail

The plaintiff is responsible for providing his/her address and in the event of a change of address, the new address of plaintiff as well as the name(s) and address(es) of each defendant(s). Therefore, the plaintiff is required to complete the portion below:

PLAINTIFF:

NAME: Landon Thomas ADDRESS: 2109 Jesse Hall Rd

DEFENDANT(S):

NAME: Pike County Mississippi ADDRESS: 2109 Jesse Hall Rd

Sheriff James Brumfield 2109 Jesse Hall Rd

Capt Richard Bynam 2109 Jesse Hall Rd

Herbert Young 2109 Jesse Hall Rd

Valerie Wells 2109 Jesse Hall Rd

Kimberly Wallace 2109 Jesse Hall Rd

Briana Dennyman 2109 Jesse Hall Rd

OTHER LAWSUITS FILED BY PLAINTIFF

NOTICE AND WARNING

The plaintiff must fully complete the following questions. Failure to do so may result in your case being dismissed.

- A. Have you ever filed any lawsuits in a court of the United States? Yes (☒) No (☐)
- B. If your answer to A is yes, complete the following information for each and every civil action and appeal filed by you. (If there is more than one action, complete the following information for the additional actions on the reverse of this page or additional sheets of paper.)

CASE NUMBER 1.

1. Parties to the action: London Thomas, Captain Richard Bynum
Sheriff James Brumfield
2. Court (if federal court, name the district; if state court, name the county): Southern
District Court of the Mississippi
3. Docket Number: Don't Remember
4. Name of judge to whom case was assigned: Don't Remember
5. Disposition (for example: was the case dismissed? If so, what grounds? Was it appealed? Is it still pending?): was dismissed on grounds that
Pike County jail withheld my mail, so I couldn't
reply to keep my case active

CASE NUMBER 2.

1. Parties to the action: _____

2. Court (if federal court, name the district; if state court, name the county): _____

3. Docket Number: _____
4. Name of judge to whom case was assigned: _____
5. Disposition (for example: was the case dismissed? If so, what grounds? Was it appealed? Is it still pending?): _____

Paper attached for Statement of Claim

STATEMENT OF CLAIM

III. State here as briefly as possible the facts of your case. Describe how each defendant is involved. Also, include the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of different claims, number and set forth each claim in a separate paragraph. (Use as much space as you need; attach extra sheet(s) if necessary).

1) I was beaten by transport officer that is now the warden charged and given no medical treatment; promised and taken out of therapy. 2) overcrowding 3) lack of supplies necessary for hygiene 4) lack of access to medical treatment and poor medical care 5) failure to protect inmates safety (MDOC inmates housed w/ county inmates, cells don't lock, lights don't work DRCA violations, No guard in tower. 7) substandard shelter (sleeping on floor, thin mats, naked cotton, leaking underwalks. Continued

— Statement of Claim Paper attached —

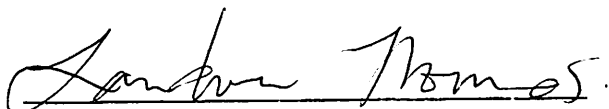
8) Withholding my mail, making me forfeit my claim due to over expired dates being passed due to holding my mail or denying to sign the appropriate paperwork

IV. State what relief you seek from the court. Make no legal arguments. Cite no cases or statutes.

RELIEF
 Compensation for Pain and Suffering and future Health problems, and mental anguish, Defamation of character, and Slander of my Name. for a Compensation of \$2.2 million

Signed this 29 day of December, 2023.

I declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct.


 Signature of plaintiff

- Statement of Claim - attached

1. I was beaten by transport officer Herbert Young that is now the Warden. I was charged with Simple Assault on a law enforcement officer. I was taken out of my Therapy treatment for a previous Medical condition, thrown in the Hole. And covered up By Richard Bynum who was the Captain at Pike County Jail
2. overcrowding, thrown in a cell block with a number double the maximum capacity intended
3. lack of personal hygiene supplies
4. lack of medical treatment, I take psych medication an Haven't received any
5. failure to protect inmates housed with County inmates an M.D.C inmates, cells don't lock, lights don't work no windows, PREA violations no guard in the tower
6. Substandard shelter, sleeping on floor, no heat thin mats, naked cotton, thin ~~blanket~~ sheet leaking ceilings,
7. Mold in showers on cell walls, made to breathe Moldy air, no ventilation, or cleaning supplies as needed
8. made to leave mail unsealed in order to send out, mail withheld or not ever receiving mail.
9. Will not comply an fill out the paperwork I send to the Authorized officer to Send back the proper paperwork

10. Inadequate meals due to not using the proper utensils to serve the food making the amounts of food served inadequate to sustain a grown man.
11. No yard calls, or inmate recreation we are on a constant 24-7 lockdown or get a yard call once or twice a month.
12. Capt Richard Bynum - for covering up the assault Herbert Young did to me. And for telling Herbert Young to press charges on me to make sure that I can't press charges on him first.
13. Valerie Wells for denying my Medical treatment and therapy that doctors requested me to take.
14. Pike County, Mississippi for housing and not putting the appropriate supervisors in charge of their jail and for not being aware what happens in their jail.
15. Richard Bynum and Herbert Young for tampering with my mail and withholding my mail to delay or forfeit my lawsuit claim last year.
16. Obstruction of justice - Warden Herbert Young, Briana Terryman, and Kimberly Wallace won't sign the paperwork I need to send this lawsuit packet back properly.

Dec 29, 2023

I am being held in Pike County Jail in Magnolia, MS 39052. I have tried to file a lawsuit against the Jail in the 2022 year. But the Captain Richard Bynum made intentional deliberate moves to keep me from filing my lawsuit by withholding my mail making sure that it was past the reply time before I got my mail back therefore forfeiting my claim. And now to this day Dec 29, 2023 The warden Herbert Young is now denying me from getting my prisoner account information sheet that only the authorized officer can sign in order to petition the court to proceed in forma pauperis to keep me from filing my lawsuit. I am looking for a subpoena to be issued to Herbert Young to make him give the appropriate information so that I can file my claim properly. If you can't subpoena him please give me the proper paperwork to fill out. OR please have someone call and get the information needed to file my claim. I give permission to look into my inmate account.